

## THE CITY OF NEW YORK LAW DEPARTMENT

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February 4, 2025

## BY ECF

Muriel Goode-Trufant

Corporation Counsel

Honorable Magistrate Judge Vera M. Scanlon United States District Court Eastern District of New York 225 Cadman Plaza East, 1214 South Brooklyn, New York 11201

Re: Joseph Garofalo v. New York City, et al., 22 CV 7620 (NM)(VMS)

Dear Magistrate Judge Scanlon:

I am an attorney in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and counsel for the Defendants in the above-referenced action. This letter is being submitted jointly with Plaintiff to advise the Court that the parties do not intend to conduct expert discovery and will complete fact discovery by February 28, 2025.

Respectfully submitted,

/s/ Nicholas Ciappetta Senior Counsel